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Attorneys for Defendant
WILLIAMS LEA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

JUDE DELGADO,

Plaintiff,

vs.

WILLIAMS LEA, INC., CHARLOTTE
DOLLY, and DOES 1 through 100,
inclusive

Defendants.

No. C07-3526 JSW

STIPULATION REGARDING
ALTERNATIVE DISPUTE RESOLUTION
AND CASE MANAGEMENT
CONFERENCE AND [PROPOSED] ORDER

Date: October 19, 2007
Time: 1:30 p.m.
Place: Crtm. 2, 17th Floor
Before: Hon. Jeffrey S. White

The parties, by and through their respective counsel of record, hereby stipulate and agree
as follows and respectfully request that the Court approve and give effect to their stipulation:

1 WHEREAS, on October 12, 2007, the parties participated in an ADR Conference Call,
2 pursuant to Local Rule 16-8(c);

3 WHEREAS, during the ADR conference call, the parties agreed to participate in this
4 Court's mediation program, pursuant to ADR Local Rule 6;

5 WHEREAS, on July 22, 2007, plaintiff filed a motion to remand this action to San
6 Francisco County Superior Court, which this Court took under submission on August 16, 2007;

7 WHEREAS, the parties believe there is a greater likelihood of settlement if they
8 participate in a mediation prior to the issuance of this Court's order on plaintiff's motion to
9 remand;

10 WHEREAS, a case management conference is currently scheduled for October 19, 2007;

11 WHEREAS, counsel for plaintiff is scheduled to be in trial in another action, styled
12 *Sylvia Reynoso v. State of California Department of Transportation*, Sacramento Superior Court,
13 Case No. 05AS03030, on October 19, 2007;

14 IT IS HEREBY STIPULATED AND AGREED that:

15 1. The parties request referral to the Court's mediation program, pursuant to ADR
16 Local Rule 6;

17 2. The parties request that the Court continue the Case Management Conference by
18 one week, to October 26, 2007, or as soon thereafter as is convenient for this Court;

19 3. The parties request that the Court hold plaintiff's motion to remand in abeyance
20 pending the parties' participation in a mediation pursuant to ADR Local Rule 6.

21 IT IS SO STIPULATED.

22 Dated: October 16, 2007

Respectfully submitted,

23 LAW OFFICES OF MICHAEL HOFFMAN

24
25
26 By _____/s/_____
MICHAEL HOFFMAN

27 Attorneys for Plaintiff
28 JUDE DELGADO

1 Dated: October 16, 2007

SONNENSCHN NATH & ROSENTHAL LLP

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3
4 By _____/s/_____
5 SONIA MARTIN

6 Attorneys for Defendants
7 WILLIAMS LEA, INC., CHARLOTTE DOLLY

8 IT IS SO ORDERED.

9
10 Dated: _____, 2007

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12 _____
13 The Hon. Jeffrey S. White

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